

Message

**From:** Ex. 6 Personal Privacy (PP)  
**Sent:** 8/18/2021 9:03:05 PM  
**To:** Hawkins, Belinda [Hawkins.Belinda@epa.gov]; Grifo, Francesca [Grifo.Francesca@epa.gov]  
**CC:** Ex. 6 Personal Privacy (PP)  
**Subject:** Ex. 6 Personal Privacy (PP) Follow Up

Touching base – This is what management is proposing.

## Ex. 5 Deliberative Process (DP)

**From:** Ex. 6 Personal Privacy (PP)  
**Sent:** Tuesday, July 20, 2021 2:42 PM  
**To:** Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Grifo, Francesca <Grifo.Francesca@epa.gov>  
**Cc:** Ex. 6 Personal Privacy (PP)  
**Subject:** Ex. 6 Personal Privacy (PP) Follow Up

Hi Francesca and Belinda,

I was wondering if you had any updates or thoughts on the peer review issue since we are being asked to discuss the charter once again.

**From:** Ex. 6 Personal Privacy (PP)  
**Sent:** Wednesday, June 16, 2021 2:02 PM  
**To:** Hawkins, Belinda <Hawkins.Belinda@epa.gov>; Ex. 6 Personal Privacy (PP) Grifo, Francesca <Grifo.Francesca@epa.gov>; Ex. 6 Personal Privacy (PP)  
**Subject:** RE: Discussion

Good Afternoon,

Since we only have an hour, and Belinda sent a great list for our discussion, I wanted to provide some of our thoughts in writing in advance.

## Ex. 5 Deliberative Process (DP)

Best,

Ex. 6 Personal Privacy (PP)

## Ex. 5 Deliberative Process (DP)

# **Ex. 5 Deliberative Process (DP)**

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## SCIENTIFIC INTEGRITY POLICY

1. To support a culture of scientific integrity within the Agency, this policy:

- a. Promotes a culture of scientific integrity, fostering honest investigation, open discussion, refined understanding, and a firm commitment to evidence.
- b. Requires adherence to applicable Agency information quality, quality assurance, and peer review policies and procedures, ensuring that the Agency produces scientific products of the highest quality, rigor, and objectivity for use in policy decisions.
- c. Recognizes the distinction between scientific information, analyses, and results from the policy decisions made based on that scientific information; policy makers within the Agency weigh the best available science, along with additional factors such as practicality, economics, and societal impact, when making policy decisions.
- d. Prohibits all EPA employees, including scientists, managers, and other Agency leadership, from suppressing, altering, or otherwise impeding the timely<sup>7</sup> release of scientific findings or conclusions.
- f. Requires all Agency employees to act honestly and refrain from acts of scientific misconduct. Scientific misconduct includes fabrication, falsification, or plagiarism in proposing, performing, or reviewing scientific and research activities, or in the publication or reporting of these activities; scientific misconduct does not include honest error or differences of opinion. Scientific misconduct is normally adjudicated by the Office of Inspector General<sup>8</sup>. The OIG has agreed to allow the Scientific Integrity Official to evaluate allegations of plagiarism (except in the circumstances listed in EPA Order 3120.5, Section 7), including making inquiries and writing reports summarizing the findings of those inquiries.
- g. Requires adherence to Agency documents that address the use and characterization of scientific information in Agency policy development, such as EPA's Action Development Process [9], the EPA's Guidance for Risk Characterization [10] and Risk Characterization Handbook [11].
- h. Recognizes that while Agency risk assessments are intended to address the needs of risk management, quantitative conclusions should not be influenced by possible risk management implications of the results.

2. To enhance transparency within Agency scientific processes, this policy:

- a. Requires reviews by Agency managers and other Agency leadership regarding the content of a scientific product to be based only on scientific quality considerations, e.g., the methods used are clear and appropriate, the presentation of results and conclusions is impartial.
- c. Establishes the expectation that when communicating scientific findings, Agency employees include a clear explication of underlying assumptions, accurate contextualization of uncertainties, and a description of the probabilities associated with both optimistic and pessimistic projections, if applicable.
- d. Strengthens the actual and perceived credibility of Agency science by, e.g., ensuring that the selection of candidates for scientific positions is based primarily on their scientific and technological knowledge, credentials, experience, and integrity; ensuring that scientific studies used to support regulatory and other policy decisions undergo appropriate levels of independent peer review; setting clear standards governing conflicts of interest; and adopting appropriate whistleblower protections.

3. To assure the protection of Agency scientists, this policy:

- a. Prohibits managers and other Agency leadership from intimidating or coercing scientists to alter scientific data, findings, or professional opinions or inappropriately influencing scientific advisory boards. In addition, policy makers shall not knowingly misrepresent, exaggerate, or downplay areas of scientific uncertainty associated with policy decisions.

-----Original Appointment-----

**From:** Hawkins, Belinda <Hawkins.Belinda@epa.gov>

**Sent:** Wednesday, June 16, 2021 10:38 AM

**To:** Hawkins, Belinda; [Ex. 6 Personal Privacy (PP)] Grifo, Francesca; [Ex. 6 Personal Privacy (PP)]

**Subject:** Discussion

**When:** Wednesday, June 16, 2021 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Microsoft Teams Meeting

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